

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE:  BDC GROUP, INC.,  Debtor.	Case No. 23-00484  <b>DECLARATION SUPPORTING APPLICATION FOR ATTORNEYS' FEES</b>
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I, Abram Carls, state as follows:

1. I am an attorney at Simmons Perrine Moyer Bergman, PLC. My firm represents Keystone Savings Bank ("Bank") in this proceeding.

2. The Bank filed a motion to show cause and ultimately obtained an order finding that Zayo Group, LLC is in contempt of court for failing to comply with the Stipulated Order entered January 24, 2024.

3. In doing so, the Bank incurred fees of \$39,107.97. These fees represent 122.25 hours of work primarily by three attorneys, Eric Lam, Joseph Porter, and myself. The rates for these attorneys and the narrative for each time entry the Bank is requesting a reward of are stated in the time and expense report attached to the motion. Unrelated entries the Bank is not seeking reimbursement for are redacted. In addition to those amounts shown, there are accrued but unbilled fees of \$2,205.00, \$701.79, and \$1,152.00, for myself, Mr. Lam, and Mr. Porter, respectively, for services and advice provided in relation to Zayo's contempt and the completion of the Bank's fee application. These amounts do not appear in the time and expense report due to my firm's billing cycle but are identified in the calculation spreadsheet.

4. I believe that the hourly rates for the individuals who worked on this matter are reasonable and are commensurate with the amounts customarily charged. I also believe that

that the time spent on the motion to contempt and related activities is reasonable and that the work was necessary to achieve the successful result we did.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 10/16/2024

Signature: /s/ Abram V. Carls